

# EXHIBIT 59

ADDENDUM ON THE COLLECTION AND REPORTING  
OF DATA ON RACE AND ETHNICITY

As noted in the Western Interstate Commission for Higher Education report, "Knocking at the college door," December 2012, the changes required in recent years by the federal government in the reporting of race and ethnicity have produced a good deal of confusion among those seeking to understand demographic trends: "Beginning in 2010-11, the last year for which we obtained enrollment data..., states and institutions were required to report data...according to a new methodology..."

"The new reporting scheme requires individuals to answer a two-part question to indicate their racial and ethnic identity. The first question is whether an individual's ethnicity is Hispanic/Latino or not. The second question is whether the individual is from one or more of five racial groups.. In addition to the new options for racial and ethnic self-identification, the process for collection of data from individuals is different than the reporting of the data to the Department of Education: individuals may self-identify as both Hispanic and any combination of races, but an individual who is Hispanic will only be reported as Hispanic. Also, individuals are not offered the choice of choosing the seventh category, Two or More Races: rather it is a reporting category derived from the individual's selections. These factors may account for some divergence in data across the years that cover the transition from one reporting scheme to another."

The report indicates that "...There is still only very limited empirical research into the effects of these reporting changes," speculating that the Hispanic population may increase, while others might decrease.

While complying with the new federal reporting requirement, Harvard also continues to report in other contexts the data based on students' actual responses to the optional application question. In

particular, Harvard and many peer institutions count students in all racial/ethnic/categories they marked.

The federal reporting system known as IPEDS (Integrated Postsecondary Education Data System) has been used by Harvard and all other institutions well before the recent changes. IPEDS has always employed a reporting method different from Harvard's and those of many other institutions. The use of yet another method has been confusing for researchers and others interested in ethnicity. That confusion has been exacerbated by a reporting paradigm which at times included Harvard Extension School numbers with those of the College.

As one illustration of the challenges posed by these two reporting regimes, the IPEDS compilation practices have sometimes inadvertently led to a public perception that the number of Harvard College students awarded a Pell Grant (a federal grant for low-income students) was significantly lower than it actually is. Because of IPEDS joint reporting of combined data from Harvard College and the Harvard Extension School (including hundreds of students not seeking degrees), it has been inaccurately reported in the media that only 11 percent of College students benefit from Pell Grants, when the accurate percentage is 17.

This challenge is doubled with the reporting of data related to student race and ethnicity. The IPEDS reporting system leads to significantly underreported percentages for all ethnicities except Hispanic Americans. The method used by Harvard and many peer institutions gives a more complete report of the way many students,

especially those of mixed heritage, actually view their racial and ethnic identities.

For instance, for the class of 2016 (which entered Harvard in the fall of 2012), IPEDS reports that 18.7 percent were Asian American, 6.7 Black or African American, and 11.1 percent Hispanic American. However, these statistics are misleading in two ways. First, they do not reflect the variety of ways in which our students may have self-identified. Second, these numbers include undergraduates enrolled full-time at both Harvard College and at the Harvard Extension School. Many readers, not knowing this fact, often assume inaccurately that they represent only students at the College.

Looking only at Harvard College and counting all the ways in which our students self-identified, we report statistics in those same three ethnicity categories as 22.4 percent Asian American, 9.3 percent Black or African American and 9.3 percent Hispanic. In short, self-identified Asian Americans and African Americans make up a significantly greater portion of Harvard College's class of 2016 than reported by the federal government.

We mention these various reporting mechanisms for race and ethnicity to demonstrate how difficult it can be for the Western Interstate Commission for Higher Education to project the demographics of future high school graduates in the U.S. We hope that future reports will help to clarify the complex and, at times, confusing data that are used to envision the very different racial and ethnic future of our nation.

